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**ORIGINAL**  
BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

DEPARTMENT OF TRANSPORTATION

May 21 2000

Application of

**TRANS WORLD AIRLINES, INC.**

under 49 U.S.C. 41718 for six (6) beyond-  
perimeter Ronald Reagan Washington National  
Airport exemption slots for nonstop service  
to Los Angeles

) Docket OST 00-7181-34

**COMMENTS OF THE ST. LOUIS PARTIES**

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May 22, 2000

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COMMENTS OF THE ST. LOUIS PARTIES

The City of St. Louis and the St. Louis Airport Commission ("St. Louis Parties") submit these comments in strong support of the application of Trans World Airlines, Inc. ("TWA") herein for six (6) beyond-perimeter Ronald Reagan Washington National Airport ("Reagan National" or "DCA") exemption slots (arrivals and departures) so that it can operate three daily roundtrip nonstop services between Los Angeles International Airport ("LAX") and Reagan National.

While TWA's proposal does not directly involve St. Louis service, TWA is St. Louis' hub carrier and a major employer in the St. Louis area. The proposal will clearly strengthen TWA and contribute to its viability. In this context, the St. Louis Parties have determined to support the proposal as one which will materially benefit the St. Louis area as well as the markets directly involved.

TWA's application clearly meets the **Air-21** criteria for granting beyond-perimeter **DCA** exemption slots, including network benefits beyond the perimeter, competitive benefits, creation of jobs, and consumer benefits.

There are unique reasons for the Administration helping TWA. The most important of these is the fact that TWA is now under ownership by its own employees. TWA's employees hold a controlling interest in the voting stock of the carrier, an equity interest for which the employees have paid substantial amounts in hard earned wages. These employees have incredible dedication to the success of the carrier. This development — the employee-ownership reorganization of TWA — represented the first successful equity reorganization of this nature in the industry and constituted a model for subsequent airline restructuring. It should be encouraged by the Administration.

**TWA's** proposed service, using 180 seat **B757** aircraft, will bring a new competitor to the Washington-Los Angeles nonstop market and to five cities in California as well as to **Kona**, Hawaii, all of which will receive their first or competitive one-stop service to Reagan National.

TWA is a new competitor for the Los Angeles — Washington, **D.C.** nonstop market. It is literally a new entrant in this market. Like other smaller carriers, **TWA's** very survival hinges upon its ability to compete in markets that are now dominated by

larger entrenched carriers, such as American, Delta, United and Northwest. Air 21 has offered the Department the opportunity, through a domestic route case, to insert vital new competition into markets beyond the perimeter. TWA's well-developed proposal meets a critical need for new competition in the Los-Angeles-Washington nonstop market while fully complying with Air 21's mandate for substantial network benefits to communities which do not currently receive one-stop access to Washington, D.C. TWA's proposal is clearly in the very top rank of all the beyond-perimeter proposals submitted in this proceeding. There is no better way to use the new beyond-perimeter slots than to help TWA fully regain its former role as a major competitor in the nation's air transportation system.

Accordingly, the St. Louis Parties respectfully urge the Department to grant TWA's Reagan National-Los Angeles application in this proceeding.

Respectfully submitted,

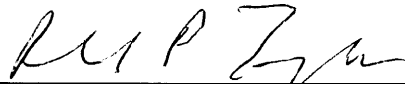


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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Comments of the St. Louis Parties by first class mail, postage prepaid, on all persons named in the attached service list.

  
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Richard P. Taylor

May 22, 2000

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